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8 **UNITED STATES DISTRICT COURT**  
9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
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11 IN RE: SOCIAL MEDIA ADOLESCENT  
12 ADDICTION/PERSONAL INJURY  
13 PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK

14 THIS DOCUMENT RELATES TO:  
15 ALL ACTIONS

**DECLARATION OF CHRISTOPHER  
CHIOU IN SUPPORT OF OMNIBUS  
SEALING STIPULATION  
REGARDING DKT. NOS. 1540 AND  
1542**

Judge: Hon. Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

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19 I, Christopher Chiou, declare as follows:

20 1. I am a partner at the law firm of Wilson Sonsini Goodrich & Rosati and attorney  
21 of record for Defendants YouTube, LLC and Google LLC (collectively (“YouTube”) in *In Re:*  
22 *Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, Case No.:  
23 4:22-md03047-YGR. I am licensed to practice law in the state of California and am admitted to  
24 practice before this Court. I submit this declaration in support of the Omnibus Sealing  
25 Stipulation in connection with the Parties’ Joint Letter Brief re Certain Noncustodial YouTube  
26 Databases (ECF No. 1540) and Joint Letter Brief re RFP Nos. 37 and 50 (Account Sign Up and  
27 Cancellation Interfaces) (ECF No. 1542). I have personal knowledge of the facts set forth in this  
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1 declaration, and I could and would testify competently to their truth if called upon to do so.

2 2. On January 14, 2025, the Parties filed the Parties' Joint Letter Brief re Certain  
3 Noncustodial YouTube Databases and its Exhibit (ECF No. 1540) and Joint Letter Brief re RFP  
4 Nos. 37 and 50 (Account Sign Up and Cancellation Interfaces) (ECF No. 1542).

5 3. I have reviewed the documents that YouTube seeks to seal pursuant to the Court's  
6 Order Granting Motion to File Under Seal; Setting Sealing Procedures (ECF No. 341). Based on  
7 my review of the documents and in consultation with YouTube, I understand there is good cause  
8 to seal the following information:

Dkt. No.	Description	Basis for Sealing
1540-1	Joint Letter Brief re Certain Noncustodial YouTube Databases redacted at 1–4	The redacted portions consist of sensitive and confidential information about YouTube's platform, repository, and tool design. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, include trade secrets and competitive information, and thereby cause competitive harm to YouTube.
1540-2	Exhibit A filed under seal	The exhibit consists of sensitive and confidential information about YouTube's platform, repository, and tool design. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, include trade secrets and competitive information, and thereby cause competitive harm to YouTube.
1542-1	Joint Letter Brief re RFP Nos. 37 and 50 (Account Sign Up and Cancellation Interfaces) redacted at 2, 4	The redacted portions consist of sensitive and confidential information about YouTube's platform design. Disclosure of the information would provide competitors with insights into YouTube's business they

1		would not otherwise have,
2		include trade secrets and
3		competitive information, and
4		thereby cause competitive
5		harm to YouTube.

6 I declare under penalty of perjury under the laws of the State of California that the  
7 foregoing is true and correct. Executed at Los Angeles, California on January 29, 2024.

8 /s/ Christopher Chiou

9 Christopher Chiou  
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